

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALPHONSE MATTHEWS,)	
)	
Plaintiff,)	No. 07 C 6926
)	
v.)	
)	JUDGE KENDALL
CITY OF CHICAGO, Chicago Police Officers)	
CALVIN CHATMAN, Star 5532,)	MAGISTRATE JUDGE KEYS
JAMES ECHOLS, Star 12329,)	
HARRY MATHEOS, Star 18599, and)	
DIMITRIOS LAMPERIS, Star 20718,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFFS' COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel, moves this court for an extension of time to answer or otherwise plead in response to Plaintiff's complaint until March 14, 2008, and in support states:

1. Plaintiff filed his six-count complaint on December 10, 2007. The complaint alleges federal claims under 42 U.S.C. § 1983 against four Chicago Police Officers as well as Illinois state law claims for Malicious Prosecution, and *Respondeat Superior* and statutory indemnification against the City.

2. Upon notice of the instant case, as in every case, counsel immediately made the necessary requests for relevant documents, in order to respond to the complaint. While many documents have been procured, some of the most important documents have yet to arrive. Without these documents, counsel cannot adequately respond to the allegations in plaintiff's complaint.

3. Defendant's counsel spoke with plaintiff's counsel, Louis Meyer, on February 29, 2008, who agreed to this extension of time.

4. Defense counsel remains hopeful that the necessary documents will be received within 14 days. Therefore, the City requests until March 14, 2008 to answer or otherwise plead in response to the complaint. Counsel will make every effort to respond to plaintiff's complaint, should the necessary documents arrive in a more timely manner.

5. Although this is the City's second request for an extension of time, it is not made for purposes of undue delay, but only to allow the City an adequate opportunity to properly respond to Plaintiff's complaint. No prejudice will result to Plaintiff by the granting of this motion.

WHEREFORE, Defendant City requests this court grant its agreed motion for an extension of time to and including March 14, 2008, to answer or otherwise plead to Plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel of the City of Chicago

By: /s/ Gail L. Reich
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